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10 Attorneys for Defendants, Counter Claimants and Third Party Claimants ROBERT E.
11 ESTUPINIAN, GINNY ESTUPINIAN and MUTUAL VISION, LLC, and Defendants and
12 Third Party Claimants MILLENNIUM REALTY GROUP, VESTA REVERSE 100, LLC,
13 VESTA CAPITAL ADVISORS, LLC, EDMUNDO ESTUPINIAN, and HAYDEE
14 ESTUPINIAN

15 **UNITED STATES DISTRICT COURT OF CALIFORNIA**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **SAN JOSE DIVISION**

18 VESTA STRATEGIES, LLC,

19 Plaintiff,

20 vs.

21 ROBERT E. ESTUPINIAN, GINNY
22 ESTUPINIAN, MUTUAL VISION, LLC,
23 MILLENNIUM REALTY GROUP,
24 VESTA REVERSE 100, LLC, VESTA
25 CAPITAL ADVISORS, LLC, CAROL-
26 ANN TOGNAZZINI, EDMUNDO
27 ESTUPINIAN, and HAYDEE
28 ESTUPINIAN,

Defendants.

AND RELATED CROSS-ACTIONS.

Case No.: C 07-06216 JW RS

**MOTION OF DEFENDANTS, COUNTER
CLAIMANTS, AND THIRD PARTY
CLAIMANTS ROBERT E. ESTUPINIAN
AND GINNY ESTUPINIAN FOR AN
ORDER COMPELLING
PLAINTIFF/COUNTER DEFENDANT
VESTA STRATEGIES, LLC AND
COUNTER DEFENDANT/THIRD PARTY
DEFENDANT JOHN TERZAKIS TO
PRODUCE TAX RECORDS AND
DOCUMENTS**

Defendants, counter claimants and third party claimants Robert E. Estupinian and Ginny
Estupinian respectfully move this Court for an order requiring plaintiff/counter defendant Vesta
Strategies, LLC and counter defendant/third party defendant John Terazkis to produce to moving

1 parties tax and financial records of Vesta Strategies, LLC, and to pay moving parties attorneys'
2 fees.

3 This motion is based upon the Memorandum of Points and Authorities and Declarations
4 of Robert Estupinian, David Buchanan and Brian O'Dea, filed herewith.

5 Date: April 30, 2008

RANDICK O'DEA & TOOLIATOS, LLP

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8 By: /s/
Brian M. O'Dea